

**Certification Regarding Compliance with  
Section 73.3526 of the FCC's Rules During the Preceding License Term**

Upon review of its Public Inspection File to determine whether documentation required by Section 73.3526 of the FCC's Rules has been uploaded when required,<sup>1</sup> Applicant found that:

- While Applicant retains a list of all documents required to be disclosed under Section 73.3613 in its Public Inspection File, some documents were not added to the station's Section 73.3613 list (or, alternatively, uploaded) within 30 days after execution. An updated Section 73.3613 list was included in the station's most recent biennial ownership report and Applicant has uploaded a supplemental list to its Public Inspection File to account for relevant documents executed since then and not already listed in the ownership report.
- The annual Equal Employment Opportunity Reports ("EEO Report") for 2016 and 2019 were uploaded on July 6, 2020, and the EEO Report for 2017 was uploaded January 28, 2019. The EEO Reports were each timely prepared but inadvertently not uploaded to the Public Inspection file by the annual August 1 deadlines.
- The Commercial Limits Certifications for Fourth Quarter 2017–First Quarter 2019 (with the exception of Third Quarter 2018) did not include a list of the programs aired during the quarter that were designed for children 12 years of age and younger. The station has uploaded amended Commercial Limits Certifications to its Public Inspection File.

Applicant will continue to remind station staff of Public Inspection File requirements and upcoming deadlines, will provide additional training to station staff, and will work to implement more robust accountability procedures to enhance the station's compliance with Public Inspection File deadlines going forward.

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<sup>1</sup> Applicant notes that the deadlines to file or upload certain documents, including the 2017 Biennial Ownership Report and the various Fourth Quarter 2018 certifications and reports, were extended due to government closures. *See* 47 C.F.R. § 1.4; *see also Revisions to Filing and Other Deadlines Following Resumption of Normal Operations*, Public Notice, DA 19-26 (rel. January 29, 2019). In addition, the deadlines to file the 2019 Children's Television Programming Report and to upload the Quarterly Issues & Programs List for First Quarter 2020 were extended due to the COVID-19 pandemic. *See Media Bureau Announces Extension of Time for Broadcasters to File Children's Programming Reports and Quarterly Issues/Programs Lists*, Public Notice, DA 20-353 (rel. March 27, 2020).